

STATE OF IOWA  
DEPARTMENT OF COMMERCE  
UTILITIES BOARD

IN RE:  U S WEST COMMUNICATIONS, INC., n/k/a QWEST CORPORATION	DOCKET NOS. INU-00-2 SPU-00-11
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**REQUEST FOR COMMENTS REGARDING  
CHANGE MANAGEMENT PLAN COMPLIANCE**

(Issued April 26, 2002)

On February 10, 2000, the Utilities Board (Board) issued an order initiating an investigation relating to the possible future entry of U S WEST Communications, Inc., n/k/a Qwest Corporation (Qwest), into the interLATA market. The investigation was identified as Docket No. INU-00-2.

The Board noted in its March 12, 2002, conditional statement regarding general terms and conditions that Liberty was unable to address one issue in its September 24, 2001, report, defined as the change management process (CMP). The issue was discussed briefly at 14. Change Management Process.<sup>1</sup> Qwest and the competitive local exchange companies (CLECs) have been involved in an extensive collaborative effort in an attempt to resolve CMP issues that apply to Qwest's operational support systems (OSS).

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<sup>1</sup> March 12, 2002, Conditional Statement pp. 39-40.

Qwest made a filing on February 19, 2002, to update the status of this process. In that filing, Qwest proposed that CLECs and other participants to this proceeding be given a reasonable amount of time to file comments on the status report. The Board deferred its consideration of the CMP issue until all participants have been given an opportunity to respond to the February 19, 2002, filing. The Board directed that responsive filings be made on or before March 19, 2002.

AT&T Communications of the Midwest, Inc. and AT&T Local Services on behalf of TCG Omaha (AT&T) and Covad Communications Company (Covad) filed comments on March 19, 2002. However, those comments were not particularly enlightening to the current status of Qwest's CMP progress. Many of the attachments to those filings were in fact copies of previous filings made in other states and predated information that Qwest provided in its February 19, 2002, filing with the Board.

This issue continues to be one that the Board finds problematic. The FCC has given guidance as to what it will consider adequate to approve an application for in-region interLATA service authority. Attached to its most recent order approving Verizon's application to provide services in Vermont, the FCC stated:

Competing carriers need information about, and specifications for, an incumbent's systems and interfaces to develop and modify their systems and procedures to access the incumbent's OSS functions. Thus, in order to demonstrate that it is providing nondiscriminatory access to its OSS, a BOC must first demonstrate that it "has deployed the necessary systems and personnel to provide sufficient access to each of the necessary OSS functions and . . . is adequately assisting competing carriers to understand how

to implement and use all of the OSS functions available to them.” By showing that it adequately assists competing carriers to use available OSS functions, a BOC provides evidence that it offers an efficient competitor a meaningful opportunity to compete. As part of this demonstration, the Commission will give substantial consideration to the existence of an adequate change management process and evidence that the BOC has adhered to this process over time.

The change management process refers to the methods and procedures that the BOC employs to communicate with competing carriers regarding the performance of, and changes in, the BOC’s OSS. Such changes may include updates to existing functions that impact competing carrier interface(s) upon a BOC’s release of new interface software; technology changes that require competing carriers to meet new technical requirements upon a BOC’s software release date; additional functionality changes that may be used at the competing carrier’s option, on or after a BOC’s release date for new interface software; and changes that may be mandated by regulatory authorities. Without a change management process in place, a BOC can impose substantial costs on competing carriers simply by making changes to its systems and interfaces without providing adequate testing opportunities and accurate and timely notice and documentation of the changes. Change management problems can impair a competing carrier’s ability to obtain nondiscriminatory access to UNEs, and hence a BOC’s compliance with section 271(2)(B)(ii).

In evaluating whether a BOC’s change management plan affords an efficient competitor a meaningful opportunity to compete, the Commission first assesses whether the plan is adequate. In making this determination, it assesses whether the evidence demonstrates: (1) that information relating to the change management process is clearly organized and readily accessible to competing carriers; (2) that competing carriers had substantial input in the design and continued operation of the change management process; (3) that the change management plan defines a procedure for the timely resolution of change management disputes; (4) the availability of a stable testing environment that mirrors

production; and (5) the efficacy of the documentation the BOC makes available for the purpose of building an electronic gateway. After determining whether the BOC's change management plan is adequate, the Commission evaluates whether the BOC has demonstrated a pattern of compliance with this plan.<sup>2</sup> (footnotes omitted)

On April 22, 2002, AT&T and Covad filed a joint brief regarding Qwest's CMP progress in which these CLECs request the Board withhold any finding of CMP compliance until Qwest provides actual, demonstrable and verifiable evidence showing:

1. that the final draft of the CMP redesign document is clearly organized and readily accessible to competing carriers (not merely an incomplete draft available on a web site);
2. that the competing carriers had substantial input into the redesign by Qwest's actual incorporation of all the agreements into its final CMP document;
3. that the final CMP defines a procedure for timely resolution of disputes and that Qwest is actually adhering to that procedure;
4. that the SATE is, in fact, a stable testing environment that mirrors production;
5. that the efficacy of Qwest's CMP documentation is demonstrated by Qwest actually following the process outlined therein and all third party observations and exceptions have been resolved; and

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<sup>2</sup> See *Application by Verizon New England Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions), Verizon Global Networks Inc., and Verizon Select Services Inc., for Authorization To Provide In-Region, InterLATA Services in Vermont*, Memorandum Opinion and Order, CC Docket No. 02-7, released April 17, 2002. Appendix D: Statutory Requirements, paras. 40-42.

6. that consistent with its promises during the § 271 workshops, Qwest has adequately updated its technical publications and PCAT to be consistent with its SGAT.<sup>3</sup>

The Board is further troubled by the following paragraph from an Order of the Colorado Public Utilities Commission, dated April 23, 2002:

In the participants' CMP briefs filed on April 8, 2002, it was obvious that Qwest did not address all of the FCC's criteria for a compliant change management plan. Rather, to support the arguments for a compliant Stand Alone Test Environment (SATE), documentation and technical assistance, Qwest simply referred the Commission to the ROC OSS test results. This was highly problematic, however, because there are many Observations and Exceptions in the ROC OSS test regarding change management, that have been closed as unresolved, unsatisfied, or still remain open.<sup>4</sup>

The Board notes that Qwest has similarly not filed any support in this docket that addresses each of the FCC criteria for a compliant change management plan.

The Board has determined that it will once again defer any positive determination as to Qwest's compliance regarding change management until such time as Qwest has provided sufficient support to prove such compliance. The Board

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<sup>3</sup> Joint CLEC brief of AT&T and Covad filed April 22, 2002 pp. 36-37.

<sup>4</sup> See *In the Matter of the Investigation into U S West Communications, Inc.'s Compliance with § 271(C) of the Telecommunications Act of 1996*, Docket No. 97I-198T, Decision No. R02-453-I, issued April 23, 2002, Order Granting, In Part, and Denying, In Part, Qwest's Motion to Schedule Dates for Full Commission Proceedings on OSS, Public Interest, Sections 272 and Track A and Procedural Order, Order Setting Procedural Schedule, and Order Setting Commission En Banc Workshop Dates, p. 9.

directs Qwest, and any other interested participant, to file comments that address the concerns discussed herein.

**IT IS THEREFORE ORDERED:**

Any participant desiring to file comments concerning Qwest's change management plan compliance may do so on or before May 3, 2002.

**UTILITIES BOARD**

/s/ Diane Munns

/s/ Mark O. Lambert

ATTEST:

/s/ Judi K. Cooper  
Executive Secretary

/s/ Elliott Smith

Dated at Des Moines, Iowa, this 26<sup>th</sup> day of April, 2002.